webserver@yucca-web1.ymp.gov on 01/30/2000 02:03:27 PM

To: EISR/YM/RWDOE
cc:

Subject: EIS Comment

January 30, 2000 14:03:27

IP address: 12.64.35.84

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The Commentors Name:
--->Mrs. Lynn C Yuan

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The Commentors Address:
--->717 Sir James Bridge Way
--->Las Vegas, Nevada 89145

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Email Information:
--->Squarey@worldnet.att.net
---> Add commentor to the mailing list : yes

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Contact Information:
---> fax number : 7028047986
---> phone number : 7028047987
---> organization : Square Y Consultants
---> position : G. Partner

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Comment Text :
-->1. Comments related to transportation risk assessment.

1 The potential collective long term risk from direct exposure to ground contamination and from ingestion pathways through food and soil contamination should be included in RADTRAN4 transportation accident analyses. In agricultural areas the collective risk from ingestion pathways could be substantially greater than the inhalation pathway. The input parameters such as the food transfer factors (ACCDNT(6,k)), soil transfer factors (ACCDNT(6,k)) and cleanup level (CULVL) used in RADTRAN4 calculations should be provided. The value of cleanup level should be estimated based on a comprehensive pathway analysis including all pathways of exposure, all nuclides of radiological significance and all weather conditions (all 6 or 7 meteorological categories).

2. Comments related to Site natural background radiation levels.

2 The DEIS lacks some very basic radiological information of the site. For the purpose of future reference and comparison the DEIS should be revised to include the following baseline background information:

2.1 The average and ranges of natural occurring radionuclide concentrations (U-238/Ra-226) of the repository rocks.

2.2 The average and ranges of background external radiation levels inside and outside the ESF.

3. Comments related to radon releases and concentrations.

3... Radon monitoring data in the ESF under current operating condition was used to estimate the amount of radon release from the site and the potential inhalation dose to workers. Since radon release from rock surfaces depends on various environmental
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3 and operational conditions of the MGR and since MGR operation would be different from the current ESF conditions, these release estimates should be reassessed in the FEIS. The effect of ventilation induced radon release due to pressure differences, the effect of heating of the rocks by waste packages, and other physical and environmental factors on radon release should be re-evaluated and included in the final assessment. All these factors could substantially increase the radon releases as well as the worker inhalation doses.
